

PHILLIPS, GOLDMAN & SPENCE, P. A.

JOHN C. PHILLIPS, JR.
STEPHEN W. SPENCE
ROBERT S. GOLDMAN
LISA C. McLAUGHLIN
JAMES P. HALL
JOSEPH J. FARANAN, III
BRIAN E. FARANAN
DAVID A. BILSON*
MELISSA E. CARGNINO

*PENNSYLVANIA BAR ONLY

ATTORNEYS AT LAW
PENNSYLVANIA AVE. AND BROOM ST.
1200 N. BROOM STREET
WILMINGTON, DELAWARE 19806
—
(302) 655-4200
(302) 655-4210 (F)

SUSSEX COUNTY OFFICE
1509 HIGHWAY ONE
DEWEY BEACH, DE 19971
(302) 226-4200
(302) 226-1205 (F)

REPLY TO: _____

July 30, 2007

Via E-File

The Honorable Chief Judge Gregory M. Sleet
United States District Court
844 North King Street
Lock Box 19
Wilmington, DE 19801

RE: Integrated Health Services of Cliff Manor, et al. v. THCI Company, LLC
Civil Action No. 04-910 (GMS)
Our File: THCIC-1

Dear Chief Judge Sleet:

I am writing to request permission, pursuant to Local Rule 7.1.2(b), to file a supplemental affidavit in support of the Motion of THCI Company LLC to Enforce the Stipulation and Order of Settlement and Dismissal (the Motion to Enforce). Briefing of the Motion to Enforce was completed as of May 11, 2007. THCI has requested oral argument and is awaiting notice from the Court as to whether a hearing will be scheduled or whether the Motion to Enforce will be decided on the papers.

In the meantime, subsequent conduct by the LTC Plaintiffs, as detailed in the supplemental affidavit, threatens to create great prejudice to THCI. THCI respectfully submits that the supplemental affidavit should be considered relative to the Motion to Enforce. A copy of the supplemental affidavit which THCI seeks to submit is attached hereto as Exhibit A.

Respectfully submitted,



LISA C. McLAUGHLIN

LCM:clb

Enclosure

cc: Drew Dickson, Esquire
Daniel J. DeFranceschi, Esquire
Amos Alter, Esquire